# California Regional Water Quality Control Board
## San Francisco Bay Region

Linda S. Adams
*Secretary for*
*Environmental Protection*

1515 Clay Street, Suite 1400, Oakland, California 94612
(510) 622-2300 • Fax (510) 622-2460
http://www.waterboards.ca.gov/sanfranciscobay

Arnold Schwarzenegger
*Governor*


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ALAMEDA POINT
SSIC NO. 5090.3

Department of the Navy
Base Realignment and Closure Program Management Office West
ATTN: Thomas L. Macchiarella
1455 Frazee Road, Suite 900
San Diego, CA 92108-4310

**Subject: Comments on the Draft Project Work Plan for the Installation Restoration Sites 5 and 10, Buildings 5 and 400 Storm Drain and Sewer Line Time-Critical Removal Action, Alameda Point, Alameda, California**

Dear Mr. Macchiarella:

Upon review of the above referenced document, we have the following comments:

### General Comments

1) Because a portion of this removal effort was previously started but never finished, please include a discussion of what was learned during the last removal effort, what issues or problems arose, and how the proposed removal activities will incorporate these lessons learned.

2) We would like to inspect the site prior to the rainy season to ensure that best management practices have been implemented and are protective of neighboring surface waters. Please work with us to schedule a time to inspect the removal action activities prior to the rainy season.

3) Historic activities in Buildings 5 and 10 were known to discharge numerous contaminants into storm and sanitary sewer lines prior to 1972. Considering this information, we request that soil and groundwater sampling be conducted where sewer lines are found to be cracked, broken, disconnected, or destroyed. Sampling should focus on contaminants associated with activities that occurred up-gradient of the damaged sections. Please revise the Work Plan to address potential historical releases of contaminants from damaged sewer lines.

### Specific Comments

1) **Section 1.1 – Removal Action Objectives – Page 1-2** – This paragraph indicates that the removal action objective (RAO) for $^{226}Ra$ is to remove radiological contamination in excess of 1 pCi/g of $^{226}Ra$ above background levels. The Draft Action Memorandum for this TCRA states the RAO is to ensure the total effective dose

equivalent (TEDE) is <15 mrem/yr. Please reference source for establishing this RAO and resolve the discrepancy between the objectives specified in this document and the TCRA Action Memorandum.

2) **Section 1.2 – Scope of Work – Page 1-2** – This paragraph summarizes the proposed scope of this TCRA. Not included in this summary is the use of soil freezing technology during sewer line removal activities, as discussed in Section 7.8.3, to minimize flow of groundwater into excavation areas. As this excavation approach is discussed later in this document, it should be summarized in this section as well.

3) **Section 2.6 – Storm Drain and Sewer Line Systems Background** – This section indicates that some sewer lines discharge to the Oakland Inner Harbor and some discharge to Seaplane Lagoon. With removal actions proposed in this work plan focusing on sewer lines that drain to Seaplane Lagoon, please indicate whether any sewer lines that discharge to the Oakland Inner Harbor may have been impacted by historic activities at this site.

4) **Section 2.7 – Previous Investigations – Page 2-4 – First paragraph** – This paragraph states that historic activities at IR Sites 5 and 10 may have led to radiological contamination flowing toward Seaplane Lagoon at Outfalls F and G. Outfall FF at Seaplane Lagoon, which also discharges sewer lines that originate in the subject area, is not mentioned here. Please indicate whether historic activities or previous investigations have identified potential radiological contamination associated with sewer lines leading to Outfall FF.

5) **Section 7.8.3 – Excavation Approach – Page 7-7 and 7-8** – This section explains that management of shallow groundwater at the site may require the installation of a well-point extraction system or a soilfreezing technique. As this is the work plan for the proposed removal action, please clearly indicate which method is being proposed and justify the selection of the proposed method. For example, if the soilfreeze method is proposed, please explain how this method was selected, and where it has been previously utilized. Please also include a discussion of the potential energy requirements using this approach and discuss whether there are other less-energy intensive approaches that might prove equally effective.

6) **Section 7.11.1 – Radiological Screening – Page 7-12 – Bottom Paragraph** – This paragraph describes how excavated soil will be dewatered prior to performing radiological surveys. Please include a description of how drainage from dewatering areas will be captured, tested, and treated. Also include a discussion of what other best management practices will be implemented in these areas to prevent wind and water erosion of soil stockpiles.

7) **Figure 6-1 – Storm Drain and Sanitary Sewer System** – This figure is unreadable. Is there any way the resolution can be improved to make this figure clearer? Also, can it be reproduced in color so the various types of pipelines in this figure can be distinguished?

8) **Appendix E, Section 2.5 – Construction Site Estimates** – As this property will ultimately be transferred to the City of Alameda, please confirm that the proposed storm water and sanitary sewer pipeline designs will conform to applicable city design standards.

9) **Appendix E, Section 4.1 – Construction Sequence/Scheduling** – Please include a timeline showing how long this removal action is expected to take place, when construction activities will be conducted with respect to the rainy season, and how activities will be scheduled around storm events.

10) **Appendix E, Section 9 – Site Inspections and Monitoring** – This section states that periodic sampling and analysis is not required, because of Resolution 2001-046. Resolution 2001-046 serves as an amendment to the General Permit for Storm Water Discharges Associated with Construction Activity (Water Quality Order 99-08-DWQ). As such, the entire amended General Permit must be referenced when evaluating potential requirements for sampling and analysis, not just Resolution 2001-046.

Section 2.1 of the General Permit explicitly requires that a sampling and analysis plan be developed and conducted for pollutants which are:

- Are not visually detectable in storm water discharges,
- Are known or should be known to occur on the construction site, and
- Could cause or contribute to an exceedance of water quality objectives in the receiving water.

Furthermore, the water quality objective for radioactivity, as specified in the Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan, current draft 12/22/06) states that radionuclides shall not be present in concentrations that result in the accumulation of radionuclides in the food web to an extent that presents a hazard to human, plant, animal, or aquatic life. Because there is a potential for radiological contamination associated with the sewer line removal, we request that periodic sampling and analysis be conducted as part of the storm water management at this site.

Please contact me at (510) 622-2355 or email ersimon@waterboards.ca.gov if you have any questions.

Sincerely,

Erich Simon
Project Manager

*CC List on following page*

CC (via US Mail and email):

Andrew Baughman
Department of the Navy
BRAC PMO West
1455 Frazee Road, Suite 900
San Diego, CA 92108-4310

Anna-Marie Cook
U.S. EPA Region IX
75 Hawthorne Street, (SFD-8-2)
San Francisco, CA 94105-3901

Dot Lofstrom
Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, CA 95826-3200

Mr. Peter Russell
Russell Resources
440 Nova Albion Way, Suite 1
San Rafael, CA 94903-3634